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Attorneys for the United States

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	NO. CR 19-00489 JST
)	
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER RE
)	PAYMENT OF CRIMINAL MONETARY
v.)	PENALTIES INTO COURT REGISTRY BEFORE
)	SENTENCING.
OLEG TINKOV)	
A/K/A/ OLEG TINKOFF,)	Sentencing date: October 29, 2021
)	Time: 9:30 a.m.
Defendant.)	Via Zoom

Defendant Oleg Tinkov, by and through his retained counsel, the United States Attorney's Office for the Northern District of California, by and through Assistant United States Attorney Michelle J. Kane, and the United States Department of Justice, Tax Division, by and through Trial Attorney Peter Anthony, hereby stipulate and agree to the following:

1. In the Plea Agreement signed on September 2, 2021, and filed on October 1, 2021 (ECF No. 25), defendant Tinkov agreed to pay \$448,957,108 in restitution to the Internal Revenue Service (IRS) before the time of sentencing.

2. During the change of plea hearing on October 1, 2021, defendant entered his guilty plea pursuant to the Agreement and the Court set sentencing for October 29, 2021.

3. In the Plea Agreement, defendant Tinkov agreed to deposit the restitution funds with the Clerk of the District Court, to be forwarded to the IRS at: IRS-RACS, Attn: Mail Stop 6261, Restitution, 333 W. Pershing Ave., Kansas City, MO, 64108.

4. The parties therefore jointly request that the Court issue this Proposed Order authorizing the Clerk to accept defendant's restitution payment prior to sentencing.

IT IS SO STIPULATED.

STEPHANIE M. HINDS
Acting United States Attorney

Dated: October 6, 2021

/s/
MICHELLE J. KANE
Assistant United States Attorney

Dated: October 6, 2021

/s/
PETER ANTHONY
Trial Attorney
U.S. Department of Justice, Tax Division

Dated: October 6, 2021

/s/
JEREMY H. TEMKIN, Esq.
Pro Hac Vice
Attorney for Defendant

Dated: October 6, 2021

/s/
CHRISTOPHER MORVILLO, Esq.
Pro Hac Vice
Attorney for Defendant

Dated: October 6, 2021

/s/
ISMAIL RAMSEY, Esq.
Attorney for Defendant

ORDER

The Court, having considered the Stipulation Regarding Payment of Criminal Monetary Penalties, which arises from the plea agreement entered in this case, the Stipulation having been executed by the United States and defendant's counsel, and good cause appearing, hereby ORDERS as follows:

1. The Stipulation is approved; and
2. The Clerk of Court for the Northern District of California shall accept from the defendant a wire transfer, check, or money order in the amount of \$448,957,108, made payable to "Clerk, United States District Court," and to hold such funds in the Clerk's Registry, including interest earned thereon, to be forwarded to the IRS as restitution at: IRS-RACS, Attn: Mail Stop 6261, Restitution, 333 W. Pershing Ave., Kansas City, MO, 64108.

IT IS SO ORDERED.

DATED: _____

HON. JON S. TIGAR
United States District Judge